

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**DEPARTMENT'S FIRST SET OF INFORMATION REQUESTS
TO VERIZON NEW ENGLAND
D.T.E. 01-39**

Pursuant to 220 C.M.R. 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits the following Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to parties in this proceeding.

1. Each request should be answered in writing on a separate three-hole punched page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Please do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if a party's witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If a party finds that any one of these requests is ambiguous, please notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. If a question refers to an Information Request of another party, please provide that response and answer with information that supplements the previous response.
8. Please serve one original copy of the responses on Mary Cottrell, Secretary of the Department, and submit one (1) copy of the responses to the following: Jesse S. Reyes, Hearing Officer; Michael Isenberg, Director, Telecommunications Division; Ashish Shrestha, Analyst; and, Peter Allen, Analyst. In addition, responses are to be transmitted to the foregoing persons by e-mail and to dte.efiling@state.ma.us.
9. Proprietary and confidential materials: Do not submit electronic copies of proprietary or confidential materials by e-mail. Requests for protective treatment of discovery responses must be accompanied by a statement of reasons for protective treatment to be considered by the Department in light of Department precedent and the statutory presumption that such documents are considered to be public information.
10. Responses are due by **January 28, 2002**.

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DTE-VZ-1-1 For each location of Covad's collocation arrangements in Massachusetts, please provide the following information:¹

- (1) What services are provisioned to this collocation arrangement? (i.e. switched access services, special access services, unbundled network elements)?
- (2) Which rate does Verizon assert should apply, and for which dates are the billings in dispute? If the applicable tariff changed after the date that Covad submitted the initial power application state the relevant dates and the applicable tariff.
- (3) How many feeds were ordered? Indicate whether this answer refers to A&B feed pairs.
- (4) Please state the number of drain amps ordered, if drain amps required was specified in any order.
- (5) Please state the number of fused amps ordered, if fused amps required was specified in any order.
- (6) Please state the amount billed by Verizon during the periods in dispute.

DTE-VZ-1-2 For any DC power order by Covad that was billed under Tariff 15, please state why Verizon billed Covad under Tariff 15. Does Verizon continue to bill for these DC power orders under Tariff 15?

¹ If Verizon seeks confidential treatment for its responses to these information requests similar to the treatment requested in its Motion for Confidential Treatment (December 11, 2001), Verizon may incorporate that motion by reference in its response, and submit both a proprietary version of its response and a public version that redacts all references to the locations of collocation arrangements and ACNA codes. A protective order will be issued at the conclusion of these proceedings.

- DTE-VZ-1-3 If a requesting party orders multiple feeds to a collocation cage, are those feeds capable of being engineered as “redundant” power sources? If so, what parts of the power distribution plant in a central office or collocation node can fail without the collocated equipment losing power?
- DTE-VZ-1-4 How many requesting parties in Massachusetts ordered only one feed (e.g. the “A-feed”) or odd numbers of feeds, rather than pairs?
- DTE-VZ-1-5 Please refer to the Verizon Collocation Application form (Covad Complaint, attachment A), at 4. If Tariff 17 provided for billing per fused amp, why did the application form direct applicants to order “Amps Drain required per feed”?